

United States
Department of the Interior
Bureau of Land Management

Miles City Field Office

EOG Resources, Inc.

NTL-4A

Determination of NEPA Adequacy
DOI-BLM-MT-C020-2013-0119-DNA

For Further Information Please Contact:

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BLM



Worksheet
Documentation of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management (BLM)

BLM Office: Miles City, Montana

NEPA Number: DOI-BLM-MT-C020-2013-119-DNA

Case File/Project No:

Proposed Action Title/Type: Flaring casing head gas

Location/Legal Description: SESE Sec. 27, T27N-R53E (Kermit 1-27H) and
NWNW Sec. 18, T26N-R53E (Devries 1-18H)

A: Description of the Proposed Action: Flaring casing head gas at EOG Resources Inc.'s
Kermit 1-27H (25-083-22221) and Devries 1-18H (25-083-22384) wells.

Applicant: EOG Resources, Inc.

County: Richland County

DNA Originator: Paul Helland

B. Land Use Plan (LUP) Conformance

LUP Name* Big Dry RMP Date Approved April, 1996

Other document: EA prepared for Nine Continental Resources, Inc. APDs including
the Cooper 1-10H (25-083-22947) (MTM100923). Date Approved April 17, 2012

Other document: _____ Date Approved _____

**List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto)*

☐ The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

☒ The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions)) Big Dry RMP, Page 325, Under **Separating, Treating, and Storage**, this section states in part, "the gas can be flared or vented into the atmosphere when authorized by permit in accordance with state and federal regulations."

C. Identify applicable National Environmental Policy Act (NEPA) document(s) and other related documents that cover the proposed action.

EA prepared for nine Continental Resources, Inc. APDs including the Cooper 1-10H (25-083-22947) (MTM100923).

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D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Yes, this action is similar to emission sources analyzed in the above mentioned environmental document and is in the same Class II airshed. The impacts would be similar to the action analyzed in the referenced environmental document. The volume of gas associated with these wells is about 25 mcf/day with about 11 mcf/day used beneficially to operate production equipment. This request is to allow for flaring of the remaining gas, approximately 14 mcf/day.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, resource values?

Yes, the current circumstances and alternatives are similar to the situation analyzed in the referenced EA. The alternatives are to continue the flaring of casing head gas or no action (not approve the continued flaring of gas). If this gas is not flared, the oil wells cannot produce oil. Flaring this gas allows these wells to continue to produce oil.

3. Is the existing analysis valid in light of any new information or circumstances (such as rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstance would not substantially change the analysis of the new proposed action?

Yes, the existing analysis is valid and circumstances have not significantly changed regarding air quality in the area.

4. Are the direct, indirect and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes, the effects are similar to the situation analyzed in the referenced EA.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes, other appropriate agencies are involved. When the operator has royalty related approval to flare or vent from the BLM, the Conditions of Approval to vent or flare state, "This approval

does not constitute approval via permit or rule to vent gas from the Oil and Gas Conservation Division, Department of Natural Resource and Conservation of the State of Montana or the Air Quality Division, Montana Department of Health and Environmental Sciences. Venting and flaring cannot occur unless it is in compliance with the aforementioned agencies' permits and administrative rules." Thus other agencies relevant to this action are involved as required.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>	<u>Initials & Date</u>
Paul Helland	Petroleum Engineer	Minerals	PH 3-25-2013
David Breisch	Assistant Field Manager	Minerals	<i>DJB 3/25/13</i>


Environmental Coordinator

3/26/2013
Date


F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

Please see attached COAs.

CONCLUSION

☒ Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked


 Approved By: _____
 Todd Yeager
 Field Manager
 Miles City Field Office

3/27/2013

 Date